



## TECHLAW INC.

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June 19, 1987

Mr. Mike Hackett  
USEPA Headquarters  
Office of Compliance Monitoring (EN-342)  
401 M Street SW  
Washington, DC 20460

RE: EPA Contract Number: 68-01-7331  
CDM Work Assignment Number: 467

Dear Mr. Hackett:

Enclosed are three sets of the completed site-specific summaries for the Transwestern Pipeline Company. Also included are three copies of our summary of the company's response to EPA's 104(e) letter, a list of chemical constituents used on our summary sheets, and a list of the Transwestern Pipeline Company facilities and sites by Region and State.

Three copies of the complete set of documents provided by the Transwestern Pipeline Company bound by Region and arranged numerically are also included.

If you have any questions or comments, please call me at (303) 233-1248.

Sincerely,

*Brenda L. Bowers*

Jo-Ann Ward *for*  
Work Assignment Manager

JAW:rls

Enclosures

cc: Ann Whitney, CDM  
Jim Kerr, TechLaw  
Gina Hargett-Freed, TechLaw

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SUMMARY OF TRANSWESTERN PIPELINE COMPANY  
RESPONSE TO 104(e) REQUEST

In response to an EPA request for information, Transwestern Pipeline Company provided a response letter and the following attachments:

- o Attachment 1.1 - Site descriptions for facilities in New Mexico
- o Attachment 1.2 - Site descriptions for facilities in Arizona
- o Attachment 2.1 - Weekly storage reports for New Mexico - 1985, 1986, 1987
- o Attachment 2.2 - Weekly storage reports for Arizona - 1985, 1986, 1987
- o Attachment 2.3 - PCB solid waste storage reports for Station 5
- o Attachment 4.1 - Condensate sample results for New Mexico facilities upstream from Station 8
- o Attachment 4.2 - Condensate sample results for Texas facilities upstream of Station 8
- o Attachment 4.3 - Condensate sample results for New Mexico facilities downstream of Station 8
- o Attachment 4.4 - Condensate sample results for Arizona facilities downstream of Station 8
- o Attachment 4.5 - PCB waste shipment manifests
- o Attachment 6.1 - Consent agreement with USEPA Region IX
- o Attachment 6.2 - Registrations for waste handling activity
- o Attachment 7.1 - USEPA guidelines for sampling pipeline systems for PCBs
- o Attachment 7.2 - PCB annual documents as per 40 CFR 761.180

The section of pipeline owned by Transwestern Pipeline crosses through Texas and New Mexico in Region VI, and Arizona in Region IX.

The documents have been numbered 1200001 through 1202108.

The data provided by the Transwestern Pipeline Company in response to the EPA's 104(e) request is discussed below. General summaries were prepared by TechLaw regarding each facility. If enough information was provided on a single disposal area within a facility, it was summarized separately. Chemical constituents were listed on our summary sheets only when detectable limits were reported.

### Response 1

Transwestern Pipeline Company provided site descriptions on pages 2 through 6 of their response letter and in Attachments 1.1 and 1.2. Driving directions, proximity to public contacts, and construction dates were included in their descriptions. Site descriptions were recorded on the first page of our summary sheets.

### Response 2

Transwestern Pipeline Company responded to question 2 on pages 6 and 7 of the response letter and provided Attachments 2.1, 2.2, and 2.3 as the primary supporting documentation. Additional information was also included in other attachments. The information provided was recorded in the following sections of the data sheets:

- o Source/Type of Waste
- o Waste Chemical Constituents
- o Specific Wastes Generated at Facility
- o Specific Wastes Stored/Treated/Disposed at Facility

### Response 3

Transwestern Pipeline Company responded to question 3 on pages 7 and 8 of their response letter. Documents addressing this question include:

- o Consent Agreement with USEPA Region IX
- o Clean-Up Plan
- o Remedial Monitoring Program
- o Memorandum discussing clean-up and remedial action

These documents were referenced in the following sections of the pertinent data sheets:

- o Any cleanup activity?
- o Describe past or future remedial action

### Response 4

Transwestern Pipeline addressed question 4 on page 8 of their response letter, and provided Attachments 4.1 through 4.5 as the primary supporting documentation. Additional data was also included in other attachments. The information provided was recorded in the following sections of the data sheets:

- o Source/Type of Waste
- o Waste Chemical Constituents

- o Specific Wastes Generated at Facility
- o Specific Wastes Stored/Treated/Disposed at Facility

#### Response 5

Transwestern Pipeline made the following statement on page 8 of their response letter: "No incidents of fire, explosions, or other incidents involving transportation, storage, disposal, or treatment of any waste stream have ever occurred on the Transwestern system."

#### Response 6

Transwestern Pipeline responded to question 6 on pages 8 and 9 of their response letter and provided Attachments 6.1 and 6.2 as supporting documentation. Permit, certification, authorization, and notification information was recorded in the following sections of the data sheets:

- o Which RCRA notifications filed?
- o Which RCRA permit obtained?
- o Comments

#### Response 7

Transwestern Pipeline discussed question 7 on page 9 of their response letter and provided Attachments 7.1 and 7.2 as supporting documents. Information concerning question 7 was recorded in the "Waste Chemical Constituents" section of the data sheet.

TRANSWESTERN PIPELINE COMPANY  
Chemical Constituents and Abbreviations  
Used in This Report

Arsenic	As
Barium	Ba
Cadmium	Cd
Carbon dioxide	CO <sub>2</sub>
Chromium	Cr
Cyanide	CN
1,2-Dichlorobenzene	C <sub>6</sub> H <sub>4</sub> Cl <sub>2</sub>
2,4-Dimethyl phenol	(CH <sub>3</sub> ) <sub>2</sub> C <sub>6</sub> H <sub>3</sub> OH
Ethylbenzene	C <sub>6</sub> H <sub>5</sub> C <sub>2</sub> H <sub>5</sub>
Hexachloroethane	Cl <sub>3</sub> CCCl <sub>3</sub>
Hexavalent chromium	--
Iron	Fe
Lead	Pb
Mercury	Hg
2-Methyl phenol	CH <sub>3</sub> C <sub>6</sub> H <sub>4</sub> OH
4-Methyl phenol	CH <sub>3</sub> C <sub>6</sub> H <sub>3</sub> OH
Methylene chloride	CH <sub>2</sub> Cl <sub>2</sub>
Monoethylamine	CH <sub>3</sub> CH <sub>2</sub> NH <sub>2</sub>
Phenol	C <sub>6</sub> H <sub>5</sub> OH
Polychlorinated biphenyls	PCBs
Selenium	Se
Silver	Ag
Sulfide	SO <sub>2</sub>
Triethylene glycol	HO(C <sub>2</sub> H <sub>4</sub> O) <sub>3</sub> H
Xylenes	C <sub>6</sub> H <sub>4</sub> (CH <sub>3</sub> ) <sub>2</sub>

TRANSWESTERN PIPELINE COMPANY

LIST OF COMPRESSOR STATIONS ORGANIZED  
BY EPA REGION AND STATE

<u>EPA Region</u>	<u>State</u>	<u>Compressor Station</u>
IX	Arizona	Needles Measurement Facility
		Mainline Compressor Station 1
		Mainline Compressor Station 2
		Mainline Compressor Station 3
		Mainline Compressor Station 4
		Remote Pig Receiver between Needles Measurement Facility and Compressor Station 1
		Remote Pig Receiver between Compressor Stations 1 and 2
		Remote Pig Receiver between Compressor Stations 2 and 3
		Remote Pig Receiver between Compressor Stations 3 and 4
		Remote Pig Receiver between Compressor Stations 4 and 5
VI	New Mexico	Mainline Compressor Station 5
		Mainline Compressor Station 6
		Mainline Compressor Station 7
		Mainline Compressor Station 8
		Station 9
		Grant's Pig Receiver
		Rio Grande River Crossing
		Corona Loop Receiver

EPA RegionStateCompressor Station

VI

New Mexico

Atoka

Bitterlakes

Black River

Burton Flat #2

South Carlsbad

Crawford

Huber Plant

Yates Plant

Station WT-1

VI

Texas

Station WT-2

Halley Plant

Keystone Plant

Puckett Plant

Pyote Plant

Cactus Station

Canadian Sales

Chenot-Putnam Plant

North Crawar

South Crawar

Getty-Campbell

Gomez Control Center

Griggs 3 Station

Henderson Drip

Marguerite Humpheries Gas Treatment

Mendota Station

Pecos River Solar Yard

EPA Region

State

Compressor Station

VI

Texas

Waha Compressor

Wapples Platter